

Hearing Date and Time: September 27, 2012 at 10 a.m. (ET)

ROBERT E. BROWN, P.C.

Attorneys for Additional Homeowners

44 Wall Street, 12th Floor

New York, N.Y. 10005

Telephone: (212) 766-9779

Facsimile: (718) 979-9784

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

)
)
)
)
)
)
)

Case No. : 12-12020 (MG)

Chapter 11

Jointly Administered

**JOINDER OF ADDITIONAL HOMEOWNERS TO THE
MOTION FOR AN ORDER APPOINTING
AN OFFICIAL COMMITTEE OF BORROWERS PURSUANT TO
SECTION 1102(a)(2) OF THE BANKRUPTCY CODE**

TO THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE:

Certain homeowners (the “Movants”)¹ who entered into mortgage contracts and/or whose loans were sold and securitized and currently are held in one or more of the debtors in these cases (collectively, “Residential Capital” or the “Debtors”) submitted a motion (the “Motion”) for an order appointing an Official Committee of Borrowers (a “Borrowers Committee”). Certain additional homeowners (the “Additional Homeowners”)² respectfully submit this Joinder to the Motion for a Borrowers Committee [Docket No. 1264].

For the reasons set forth in the Motion, homeowners must have a seat at the table and representative voice as settlements are proposed and reorganization plans are drafted. An additional Borrowers Committee is necessary to avoid inherent conflicts of interest of the seated Creditors Committee. Absent appointment of an official Borrowers Committee, the homeowner-creditors will have no protection and no representation. An official Borrowers Committee will ensure a voice in negotiations over a bankruptcy plan to ensure it does not improperly impair borrowers’ rights in numerous respects.

As fully set forth in the Motion, Additional Homeowners respectfully request that this Court appoint an official Borrowers Committee and direct the United States Trustee to appoint its members.

¹ Capitalized terms that are not defined herein shall have the meanings given to such terms in the Motion.

² The Additional Homeowners are: Gordon Dade; George & Tracey Fischell; Porchia Jones; Christopher & Heidi Kennedy; Joyce Landry; Ryan & Becki Maas; Ken & Herthon Morgan; Liese Nichols; Debra & Steven Shaver; Susan & Talin Stephen; Robert Sweeting; Betty Taylor; Jaqueline Warner; Destry White.

Dated: September 26, 2012

/s/ Bennette D. Kramer

Bennette D. Kramer

SCHLAM STONE & DOLAN LLP
Attorneys for Additional Homeowners
26 Broadway, 19th Floor
New York, New York 10004
(212) 344-5400
bdk@schlamstone.com

Respectfully Submitted,

/s/ Robert E. Brown

Robert E. Brown

ROBERT E. BROWN, P.C.
Attorneys for Additional Homeowners
44 Wall Street, 12th Floor
New York, N.Y. 10005
(212) 766-9779
rbrown@robertbrownlaw.com
rbrown@robertbrownlaw.com